

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DAWN THOMPSON,

Plaintiff,

v.

MICRON TECHNOLOGY, INC.,  
MICRON SEMICONDUCTOR  
PRODUCTS, INC., CRUCIAL  
TECHNOLOGY, INC., NANYA  
TECHNOLOGY CORPORATION,  
NANYA TECHNOLOGY  
CORPORATION USA, INFINEON  
TECHNOLOGIES AG, INFINEON  
TECHNOLOGIES NORTH AMERICA  
CORPORATION, MOSEL VITELIC  
CORPORATION, MOSEL VITELIC  
CORPORATION USA, WINBOND  
ELECTRONICS CORPORATION,  
WINBOND ELECTRONICS  
CORPORATION AMERICA, NEC  
ELECTRONICS AMERICA, INC., HYNIX  
SEMICONDUCTOR INC., HYNIX  
SEMICONDUCTOR AMERICA, INC.,  
SAMSUNG ELECTRONICS CO., LTD,  
SAMSUNG SEMICONDUCTOR, INC.,  
ELPIDA MEMORY, INC., AND ELPIDA  
MEMORY USA, INC.

Defendants.

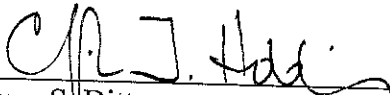
04 10778 JLT  
Civil Action No. \_\_\_\_\_

**CORPORATE DISCLOSURE STATEMENT OF  
ELPIDA MEMORY (USA) INC.**

Pursuant to Local Rule 7.3, defendant Elpida Memory (USA) Inc. ("Elpida")  
hereby discloses the following information:

Parent corporation: Elpida Memory, Inc.

Publicly held companies owning 10% or more of Elpida's stock: None.

By:   
James S. Dittmar (BBO #126320)  
Christopher T. Holding (BBO #600627)  
GOODWIN PROCTER LLP  
Exchange Place  
Boston, Massachusetts 02109-2881  
(617) 570-1000

*Counsel for Elpida Memory (USA) Inc.*

*Of Counsel*

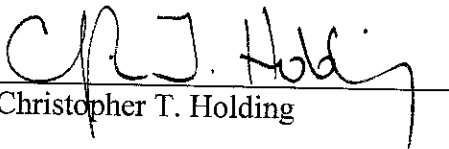
Robert B. Pringle  
THELEN REID & PRIEST LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105-3601  
(415) 371-1200

Dated: April 16, 2004.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Corporate Disclosure Statement has been served this 16th day of April, 2004 upon:

Kenneth C. Gilman  
John Martland  
GILMAN AND PASTOR, LLP  
Stonehill Corporate Center  
999 Broadway, Suite 500  
Saugus, MA 01906

  
Christopher T. Holding

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